

**FOLEY & LARDNER LLP**  
ONE MARITIME PLAZA, SIXTH FLOOR  
SAN FRANCISCO, CA 94111-3409  
TELEPHONE: 415.434.4484  
FACSIMILE: 415.434.4507

LAURENCE R. ARNOLD, CA BAR NO. 133715  
EILEEN R. RIDLEY, CA BAR NO. 151735  
SCOTT P. INCIARDI, CA BAR NO. 228814  
Attorneys for STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S HOSPITAL

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL,

Petitioners,

vs.

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715,

Respondent.

Case No: 5:07-CV-05158-JF

[PROPOSED] ORDER GRANTING  
STANFORD HOSPITAL AND  
CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION  
TO COMPEL RESPONSES TO  
DISCOVERY SUBPOENA  
PROPOUNDED TO LOCAL 521

Date: August 27, 2008  
Time: 9:30 A.M.  
Dept: Courtroom 4, 5th Floor

Judge: Hon. Jeremy Fogel  
Magis. Judge: Hon. Richard Seeborg

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner and Counter-  
Respondent,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents and Counter-  
Petitioners.

Case No: 5:08-CV-00213-JF

Judge: Hon. Jeremy Fogel

[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA  
PROPOUNDED TO LOCAL 521

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-00215-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-00216-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-01726-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-01727-JF

Judge: Hon. Jeremy Fogel

2

[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA  
PROPOUNDED TO LOCAL 521

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

1  
2 The Motion to Compel Responses To Discovery Subpoena Propounded To Local  
3 521 (the "Motion") brought by Stanford Hospital And Clinics and Lucile Packard  
4 Children's Hospital (the "Hospitals"), in the above-referenced related cases came on for  
5 hearing before the above-captioned Court, the Honorable Richard Seeborg presiding, on  
6 \_\_\_\_\_, 2008.

7 The Court, having considered the pleadings in this matter, and all papers submitted  
8 in support of, and in opposition to, said motion, and having heard the argument of  
9 counsel, and good cause appearing therefore, hereby **GRANTS** the Motion in its entirety.

10 Service Employees International Union, Local 521 ("Local 521") shall provide  
11 full and complete responses to the subpoenas propounded upon it by the Hospitals in the  
12 above-referenced cases. Local 521's responses shall include electronically stored  
13 information that is responsive to the subpoenas, including website-related information.  
14 Any withholding of responsive information on the basis of a privilege or work product  
15 protection shall be supported by a privilege log that identifies the documents withheld on  
16 a document by document basis, including the following information:

- 17 1) the Bates number of the document;  
18 2) the date of the document;  
19 3) the specific individual author/s of the document;  
20 4) the specific individual recipient/s of the document;  
21 5) a precise document description;  
22 6) the specific privilege/s claimed; and  
23 7) the present location of the document.

24 Local 521 shall not withhold responsive information not subject to a privilege or work  
25 product protection.

26 Local 521 is ordered to serve responsive documents on or before the tenth  
27 business day following the date of this order.

1 It is further ordered that Local 715 shall pay the Hospitals' reasonable expenses  
2 incurred in making this motion, including attorneys fees, in the amount of  
3 \$\_\_\_\_\_.

4 IT IS SO ORDERED.

5  
6 Dated:

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

---

HON. RICHARD SEEBORG  
MAGISTRATE JUDGE OF THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
CALIFORNIA, SAN JOSE DIVISION